

Exhibit “A”

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Plaintiff received health care services from Montgomery Radiology and the health care professionals at Montgomery Radiology can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 303-305. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit.

**David Alexander, D.O. and other
Personnel Employed by
Alabama Emergency Room Admin. Services
Baptist South Emergency Room
P.O. Box 11047
Birmingham, Alabama 35202
Account 1147081**

Plaintiff was seen at the emergency room at Baptist Medical Center South and the health care professionals at that facility can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 53-75. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. The physician who first saw Plaintiff in the emergency room advised Plaintiff that Plaintiff was the fourth or fifth patient who had been injured at the Hyundai Plant and who had been seen in the Emergency Room that same day.

**Brian Divelbiss, M.D.
Dickson Diveley Midwest Orthopaedic Clinic
3651 College Boulevard
Leawood, Kansas 66211
Patient Account 203268**

Plaintiff was seen by Dr. Brian Divelbiss at Dickson-Diveley Midwest Orthopaedic Clinic and the health care professionals at that facility, including Dr. Divelbiss, can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 1-14. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other

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health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. Dr. Divelbiss can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Dr. Divelbiss performed the March 2, 2005 surgery (open reduction and internal fixation of right scaphoid). See Operative Report set forth at pages 10-13 and pages 28-29 of the medical records that have previously been provided to defense counsel.

Dr. Brian Divelbiss
Kansas City Orthopaedic Institute
3651 College Boulevard
Leawood, Kansas 66211
Patient Account No. 137707

Plaintiff was seen by Dr. Brian Divelbiss at Kansas City Orthopaedic Institute and the health care professionals at that facility, including Dr. Divelbiss, can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 15-39. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. Dr. Divelbiss can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Dr. Divelbiss performed the March 2, 2005 surgery (open reduction and internal fixation of right scaphoid). See Operative Report set forth at pages 10-13 and pages 28-29 of the medical records that have previously been provided to defense counsel.

Dr. Louise Kaine
Sunflower Medical Group
5555 W. 58th Street
Mission, Kansas 66202-1999
Patient Account : 509-66-4273

Plaintiff was seen by Dr. Kaine at the Sunflower Medical Group on April 11, 2005, May 9, 2005, May 12, 2005 and June 20, 2005. Dr. Kaine and the health care professionals at Sunflower Medical

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Group can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 40-52. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit.

Dr. Kaine can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Dr. Kaine can also testify that because of the rib fractures that Plaintiff sustained in the accident which is the subject of this lawsuit, Plaintiff was unable to breathe deeply and properly and, as a result, developed pneumonia.

**Physical Therapists at
Mid-America Rehabilitation Hospital
5701 W. 110th Street
Overland Park, Kansas 66211
Patient Account : 10137487**

Plaintiff was seen at Mid-America Rehabilitation Hospital and the health care professionals at that facility can testify as to the matters set forth in the medical records from that facility, said medical records having previously been provided to defense counsel and page numbered as pages 77-155. They can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. The physical therapists at Mid-America Rehabilitation Hospital can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

**Personnel employed by
Shawnee Mission Medical Center
9100 W. 74th Street
Shawnee Mission, Kansas 66204
Patient Control Number 2025526**

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Personnel employed by Shawnee Mission Medical Center can testify as to the fact that Plaintiff sustained fractures of the right 10th, 11th, and 12th ribs (see May 12, 2005 Radiology Report, attached hereto at page 162) and as to the fact that Plaintiff underwent a CT Scan with intravenous contrast at Shawnee Mission Medical Center on April 12, 2005, and this showed "posterior inferior right rib fractures involving the posterior medial right twelfth rib, mid-posterior right eleventh rib and posterolateral right tenth rib. In addition, there are non-displaced fractures involving the right transverse processes of the L1 and L2 vertebra." (See April 12, 2005 Radiology Report, attached hereto at page 167). Medical records from this facility are attached hereto at pages 156-237.

Empi
599 Cardigan Road
St. Paul, Minnesota 551264099
Account Number: 2524141
Serial Number: 2614055

Plaintiff purchased her TENS Unit from EMPI, as more fully set forth at pages 306-309 of the medical records that have previously been provided to defense counsel.

Hanger Prosthetics and Orthotics
120 N.W. Parkway
Riverside, Missouri 64150
Invoice EA40XFQPFW

Plaintiff was supplied various health care devices from Hanger.

Howard A. Aks, M.D.
Pain Management Associates
A Division of Anesthesia Associates of Kansas City
Menorah Medical Center
5721 W. 119th Street
Overland Park, Kansas 66209
Pain Clinic Telephone: 913.498.6124
Pain Clinic Fax: 913.498.6122

Dr. Aks administered a stellate ganglion block to Plaintiff (see page 334 of the medical records that have previously been provided to defense counsel) and can testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit.

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Dr. Aks can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Lynn Ketchum, M.D.
5701 W. 119th Street, Suite 215
Overland Park, Kansas 66209
Tele: 913.451.8567

Dr. Ketchum performed the following surgery on Plaintiff on October 21, 2005: Release of right flexor carpi radialis tunnel, right. This surgery was performed at the Surgicenter of Johnson County. See Report of Operation at pages 262-263 of the medical records that have previously been provided to defense counsel.

Dr. Ketchum can testify as to the matters set forth in the medical records from his office, said medical records having previously been provided to defense counsel and page numbered as pages 272-299. He can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for his services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit.

Dr. Ketchum can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Dr. Andrew Jacobs
800 W. 47th Street, Suite 514
Kansas City, Missouri 64112
Tele: 816-561-5556

Dr. Jacobs is a psychologist who has seen Plaintiff for the mental and emotional anguish she has experienced due to the pain she has suffered and continues to suffer as the result of the injuries she sustained in the accident that is the subject of this lawsuit. Dr. Jacobs can also testify as to the severity of the impact that Plaintiff's injuries have had (and will continue to have) on her profession and on her life.

Nick Vedros
Vedros and Associates, Inc.
1510 Jarboe Street
Kansas City, Missouri 64108

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Tele: 816-471-5488

Mr. Vedros is a professional photographer and can testify as to the impact that Plaintiff's injuries have had and will continue to have on her ability to work as a photographer.

Georgia DeVrieze
14865 W. 255th Street
Paola, Kansas 66071
Tele: 913-879-2228

Ms. DeVrieze can testify as to the adverse impact that Plaintiff's injuries have had on her life.

Noel MacClymont
22718 W. 73rd Street
Shawnee, Kansas 66227
Tele: 913-441-9689

Mr. MacClymont can testify as to the adverse impact that Plaintiff's injuries have had on her life.

Julie Toman
22723 W. 73rd Street
Shawnee, Kansas 66227
Tele: 913-481-4131

Ms. Toman can testify as to the adverse impact that Plaintiff's injuries have had on her life.

Frank Hamilton
9204 N.W. 76th Terrace
Kansas City, Missouri 64152
Tele: 816-803-2037

Mr. Hamilton is a professional photographer and can testify as to the adverse impact that Plaintiff's injuries have had on her career and on her life.

Kevin Anderson
c/o The Shawnee Dispatch
10314 Shawnee Mission Parkway
Shawnee, Kansas 66203
Tele: 913-302-4932

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Mr. Anderson is a professional photographer and photo editor and can testify as to the adverse impact that Plaintiff's injuries have had on her career and on her life.

Terri Voyles
33808 East Corn Spur Road
Lone Jack, Missouri 64070
Tele: 913-498-1401 – Work
Tele: 816-506-3677 – Cell

Ms. Voyles is a professional photographer and photo editor and can testify as to the adverse impact that Plaintiff's injuries have had on her career and on her life.

Monterey Anthony
15091 S.E. Oregon Trail Drive
Clackamas, Oregon 97015
Tele: 503-515-7850-cell
Tele: 503-658-1735-home

Mr. Anthony is a professional photographer and can testify as to the adverse impact that Plaintiff's injuries have had on her career and on her life.

Dr. Barbara Batts, M.D.
1010 Carondelet #328
Kansas City, Missouri 64114
Tele: 816-941-0700

Dr. Batts can testify as to the adverse impact Plaintiff's injuries have had on her life.

Bill Dalton
c/o Dalton's Flowers, Inc.
8135 Santa Fe Dr.
Overland Park, Kansas 66204
Tele: 913-642-2112

Mr. Dalton can testify as to the adverse impact Plaintiff's injuries have had on her life.

Kathleen Sullivan
c/o Dalton's Flowers Inc.
8135 Santa Fe Drive
Overland Park, Kansas 66204

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Tele: 913-642-2112

Ms. Sullivan can testify as to the adverse impact Plaintiff's injuries have had on her life.

Shannon Dukes
632 W. 39th Street
Kansas City, Missouri 64111
Tele: 816-960-3409

Ms. Dukes can testify as to the adverse impact Plaintiff's injuries have had on her life.

Su Lynn Hanson
14126 Slater
Shawnee Mission, Kansas 66221
Tele: 913-530-3773

Ms. Hanson is a hand therapist who has treated Plaintiff's injuries. She can testify as to the nature and extent of Plaintiff's injuries and as to the treatment that she has rendered to Plaintiff as Plaintiff's hand therapist.

Toni Wood
21516 W. 72nd St.
Shawnee, Kansas 66218
Tele: 913-441-0659

Ms. Wood can testify as to the adverse impact Plaintiff's injuries have had on her life.

Andrea Long
22725 W. 73rd Street
Shawnee, Kansas 66227
Tele: 913-963-3523

Ms. Long can testify as to the adverse impact Plaintiff's injuries have had on her life.

Garvey Scott
713 E. 77th Street
Kansas City, Mo. 64131
Tele: 816-392-1243

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Mr. Scott can testify as to the adverse impact Plaintiff's injuries have had on her career and on her life.

Susanne Sklar
The Queen's College
Oxford
OX1 4AW
England

Ms. Sklar can testify as to the adverse impact Plaintiff's injuries have had on her life.

Mike Moorhead
Prairiebrooke Arts
7900 Santa Fe Drive
Overland Park, Kansas 66204
Tele: 913-341-0333

Mr. Moorhead can testify as to the adverse impact Plaintiff's injuries have had on her life.

Ann Payne
George Butler Associates
9801 Renner Rd.
Shawnee, Mission, Kansas
Tele: 913-492-0400

Ms. Payne can testify as to the adverse impact Plaintiff's injuries have had on her life.

Kate Pella
kgpella@earthlink.net
Tele: 816-635-3850
Tele: 816-835-7262

Ms. Pella can testify as to the adverse impact Plaintiff's injuries have had on her life.

Dr. Douglas Whitley
4601 W. 109th Street #202
Overland Park, Kansas 66211
Tele: 913.491.3376

Dr. Whitley can testify as to the adverse impact Plaintiff's injuries have had on her life.

Nancy Brandell
NBrandell@aol.com
Tele: (816) 537-9960

Ms. Brandell can testify as to the adverse impact Plaintiff's injuries have had on her life.

Douglas Cusick, M.D.
4601 College Blvd.
Shawnee Mission, Kansas 66211
913-661-0202

Plaintiff was seen by Dr. J. Douglas Cusick, M.D. Dr. Cusick, can testify as to the matters set forth in the medical records from that facility, said medical records being attached hereto at pages 376-386. He can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. Dr. Cusick can also testify that the injuries that Plaintiff sustained in the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Dr. Cusick performed the August 14, 2005 surgery (first dorsal compartment release, first dorsal compartment synovectomy, synovectomy of the second dorsal compartment, second dorsal compartment release, and radial nerve dissection). See Operative Report set forth at pages 381 of the medical records which were previously provided to defense counsel.

Vito J. Carabetta, M.D.
407 South Clairborne Road, Suite 106
Olathe, Kansas 66062
Tele: 913.829.2525
Fax Number 913.829.1748

Dr. Carabetta performed an electrodiagnostic study of Plaintiff on August 2, 2006 and can testify as to the matters set forth in his report, attached hereto at pages 382-383. He can also testify as to the injuries suffered by Plaintiff, the fact that those injuries resulted from the accident which is the subject of this lawsuit, and as to the reasonableness of the bill Plaintiff received for their services and the services of other health care professionals and health care facilities and as to the fact that these bills were for treatment that was necessary to treat injuries that Plaintiff sustained in the accident that is the subject of this lawsuit. Dr. Carabetta can also testify that the injuries that Plaintiff sustained in

the accident which is the subject of this lawsuit has made it impossible for Plaintiff to pursue her career as an industrial photographer.

Health Care Professionals at Shawnee Mission Medical Center
9100 W. 74th Street
Shawnee Mission, Kansas 66204

Dr. Cusick performed the August 14, 2006 surgery on Plaintiff at Shawnee Mission Medical Center.

Health Care Professionals at Shawnee Mission Medical Center - Therapy Plus/Sports Care
9100 W. 74th Street
Shawnee Mission, Kansas 66204
913-676-2238

Shawnee Mission Medical Center - Therapy Plus/Sports Care is administering physical therapy to Plaintiff following her August 14, 2006 and will continue to provide Plaintiff with physical therapy. Plaintiff was first seen at Shawnee Mission Medical Center - Therapy Plus/Sports Care on Wednesday, September 6, 2006. Further, Plaintiff was seen at Shawnee Mission Medical Center - Therapy Plus/Sports Care on two occasions during the week of Monday, September 11, 2006. Plaintiff will continue to be seen there on a once a week basis for the next few months. After a few months of therapy, Dr. Cusick will determine whether Plaintiff will need another surgery on her wrist. Plaintiff's range of motion is still very limited and she is still in lots of pain.

Kym Brungardt
Shawnee Mission Medical Center - Therapy Plus/Sports Care
9100 W. 74th Street
Shawnee Mission, Kansas 66204
913-676-2238

Ms. Brungardt is Plaintiff's primary physical therapist at Shawnee Mission Medical Center - Therapy Plus/Sports Care. Ms. Brungardt is administering physical therapy to Plaintiff following her August 14, 2006 and will continue to provide Plaintiff with physical therapy. Plaintiff was first seen at Shawnee Mission Medical Center - Therapy Plus/Sports Care on Wednesday, September 6, 2006. Further, Plaintiff was seen at Shawnee Mission Medical Center - Therapy Plus/Sports Care on two occasions during the week of Monday, September 11, 2006. Plaintiff will continue to be seen there on a once a week basis for the next few months. After a few months of therapy, Dr. Cusick will determine whether Plaintiff will need another surgery on her wrist. Plaintiff's range of motion is still very limited and she is still in lots of pain.

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Plaintiff's treating physicians and health care providers (as identified hereinabove) will also testify as to the nature and extent of the injuries Plaintiff sustained as the result of the accident which is the subject of this lawsuit, the reasonableness and necessity of the medical bills that Plaintiff has incurred, Plaintiff's prognosis, and Plaintiff's need for future medical treatment. The bills which will be the subject of this testimony total \$55,286.34 and Plaintiff continues to incur additional medical bills for additional medical treatment due to the injuries she sustained in the accident which is the subject of this lawsuit. The medical bills include the following:

Health Care Provider	Date of Service	Amount of Bill
Dickson-Diveley		
Midwest Orthopaedic Clinic		
[341]	02/24/2005	475.00
	02/25/2005	53.00
	03/02/2005	1,500.00
	03/04/2005	750.00
	03/21/2005	155.00
	03/21/2005	30.00
	03/21/2005	79.00
	03/21/2005	63.00
	04/05/2005	155.00
	04/05/2005	30.00
[342]	04/18/2005	63.00
	05/27/2005	63.00
	07/20/2005	103.00
	08/15/2005	103.00
	09/06/2005	350.00
[343]	10/12/2005	103.00
Kansas City		
Orthopaedic Institute		
[351]	03/02/2005	8,455.66
Louise Kane, D.O.		
Sunflower Medical Group		
[52]	04/11/2005	90.00
	05/09/2005	72.00
	06/20/2005	55.00
	05/12/2005	72.00

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Baptist Medical Center South	[73]	01/26/2005	4,692.20
Alabama Emergency Room Admin Serv.	[76]	01/26/2005	354.00
Mid-America Rehabilitation Hospital	[357-372]	04/14 to 08/12/2005	10,837.75
Shawnee Mission Medical Center	[354-355]	04/12/2005	2,694.00
	[356]	05/12/2005	488.00
Surgicenter of Johnson County	[339-340]	10/21/2005	1,649.00
		10/21/2005	755.00
		01/06/2006	1,510.00
		01/06/2006	1,026.00
		01/06/2006	1,055.00
Lynn D. Ketchum, M.D.	[299]	10/17/2005	75.00
		10/17/2005	100.00
		10/21/2005	1,850.00
		11/07/2005	110.00
		11/07/2005	24.00
		11/28/2005	85.00
		11/28/2005	110.00
		11/28/2005	18.00
	[316]	02/07/2006	125.00
Westport Anesthesia Services	[300-302]	03/02/2005	1,216.00

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Montgomery Radiology

[305]	01/26/2005	33.00
	01/26/2005	33.00
	01/26/2005	254.00
	01/26/2005	245.00

EMPI

[308]	05/31/2005	778.23
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Howard A. Aks, M.D.

Pain Management Associates

[344]	02/10/2006	164.00
	02/10/2006	260.00
[345]	02/16/2006	56.00
	03/08/2006	56.00
	02/10/2006	500.00
	02/22/2006	56.00
[346]	03/14/2006	56.00
	03/17/2006	56.00
	03/31/2006	56.00
	04/21/2006	56.00

Menorah Medical Center

[352]	02/10/2006	1,135.50
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Andrew A. Jacob, Ph.D.

[373-374]	03/22/2006	250.00
	03/30/2006	135.00
	04/04/2006	135.00
	04/07/2006	135.00
	04/11/2006	135.00
	04/14/2006	135.00
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	04/21/2006	135.00
	04/25/2006	135.00
	05/02/2006	135.00
	05/09/2006	135.00
	05/12/2006	135.00
	05/17/2006	135.00
	05/24/2006	135.00
	05/31/2006	135.00

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06/08/2006	135.00
06/14/2006	135.00
06/21/2006	135.00
06/28/2006	135.00
07/11/2006	135.00
07/20/2006	135.00

J. Douglas Cusick, M.D.

[384-386]

03/08/2006	94.00
08/08/2006	94.00
08/27/2006	1,050.00
08/27/2006	1,050.00
08/27/2006	2,050.00
08/27/2006	1,305.00
08/27/2006	1,305.00

Total:

55,286.34

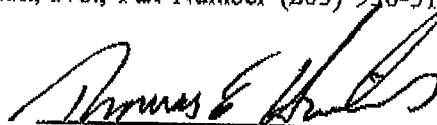
HANKINS & CONKLIN, P.C.



Thomas E. Hankins - MO #26005
 6812 North Oak Trafficway, Suite 5
 Gladstone, Missouri 64118-2587
 Telephone: (816) 436-3100
 Fax No. (816) 436-8643
 E-Mail: tomhankinslaw@cs.com
 Attorneys for Plaintiff

Certificate of Service

I hereby certify that a true and accurate copy of the above and foregoing document (Plaintiff's Disclosure of Those Persons Who May Be Used At Trial to Present Evidence under Rules 701, 702, 703, or 705 of the Federal Rules of Evidence) was transmitted by fax this 1st day of November, 2006 to Mr. James B. Carlson, Sirote & Permutt, P.C., Fax Number (205) 930-5101, Attorneys for Defendant.



Thomas E. Hankins
 Attorney for Plaintiff